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20 *Attorneys for Defendant Coe Juracek*

21 UNITED STATES DISTRICT COURT
22 CENTRAL DISTRICT OF CALIFORNIA
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25 JULIA HUBBARD and KAYLA
26 GOEDINGHAUS,

27 Plaintiffs,

28 v.

29 TRAMMELL S. CROW, JR., DR.
30 BENJAMIN TODD ELEER,
31 RICHARD HUBBARD, DR.
32 MELISSA MILLER, DR. JOSEPH
33 BROLIN, DR. SCOTT WOODS, DR.
34 MRUGESHKUMAR SHAH,
35 MICHAEL CAIN, COE JURACEK,
36 PHILIP ECOB, H.J. COLE, TEXAS
37 RANGER CODY MITCHELL, KURT
38 KNEWITZ, PAUL PENDERGRASS,
39 RALPH ROGERS, ROBERT PRUITT,
40 SCOTT BRUNSON, CASE GROVER,
41 RICHARD BUTLER, MARK
42 MOLINA, MICHAEL HYNES, JR.,
43 SHAWN MAYER, JADE MAYER,
44 RCI HOSPITALITY HOLDINGS,
45 INC., INTEGRITY BASED
46 MARKETING, LLC. STORM

Case No. 2:22-cv-7957-FLA-MAA

**STIPULATION TO EXTEND
TIME TO RESPOND TO INITIAL
COMPLAINT BY NOT MORE
THAN 30 DAYS (L.R. 8-3)**

Complaint Served: January 28, 2023
Current Response Date: February 21,
2023
New Response Date: March 23, 2023

Judge: Hon. Fernando L. Aenlle-Rocha
Courtroom: 6B

1 FITNESS NUTRITION, LLC, ULTRA
2 COMBAT NUTRITION, LLC,
3 ECOLOFT HOMES LLC, ELÉVATED
4 WELLNESS PARTNERS LLC, DOE
5 INDIVIDUALS 1-20, and DOE
6 COMPANIES 21-30

Defendants.

1 Pursuant to Local Rules 7-1 and 8-3, Plaintiffs Julia Hubbard and Kayla
2 Goedinghaus (“Plaintiffs”), and Defendant Coe Juracek (“Juracek”) (collectively “the
3 Parties”), by and through their counsel, hereby stipulate as follows:

4 WHEREAS, Plaintiffs filed the Complaint in this action on November 1, 2022;

5 WHEREAS, Plaintiffs served the Complaint on Juracek on January 28, 2023;

6 WHEREAS, Juracek’s response to the Complaint is currently due on February
7 21, 2023;

8 WHEREAS, Juracek has requested and Plaintiffs have agreed to a 30-day
9 extension for Juracek’s response to the Complaint, which would give Juracek until
10 March 23, 2023 to respond;

11 WHEREAS, this is Juracek’s first request to extend time to respond to the
12 initial Complaint;

13 WHEREAS, Local Rule 8-3 states that “[i]f the stipulation ... does not extend
14 the time [to respond to the initial complaint] for more than a cumulative total of thirty
15 (30) days from the date the response initially would have been due, the stipulation
16 need not be approved by the judge.”

17 NOW, THEREFORE, by and through their respective counsel of record, the
18 Parties hereby stipulate and agree that the deadline for Juracek to respond to Plaintiffs’
19 Complaint shall be extended to March 23, 2023; the Parties further stipulate and agree
20 that this stipulation shall not waive any potential defenses, including those relating to
21 jurisdiction, forum, or venue.

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23 IT IS SO STIPULATED.
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1 DATED: February 16, 2023

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

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3
4 By/s/ Diane Doolittle

5 Diane Doolittle

6 Alex Bergjans

7 Attorneys for Defendant Coe Juracek

8 DATED: February 16, 2023

BALESTRIERE FARIELLO
KABATECK LLP

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10
11 By/s/ Matthew W. Schmidt

12 John G. Balestriere

13 Matthew W. Schmidt

14 Anastasia Mazzella

15 Attorneys for Plaintiffs Julia Hubbard and
16 Kayla Goedinghaus
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ATTESTATION STATEMENT

I, Alex Bergjans, the filer of this Stipulation, attest pursuant to L.R. 5-4.3.4(a)(2) that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

DATED: February 16, 2023

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

By/s/ Alex Bergjans

Alex Bergjans

Attorneys for Defendant Coe Juracek